



Chandler • Arizona

Where Values Make The Difference

November 30, 2005

Robert Johnson, Regional Director
US Bureau of Reclamation
Lower Colorado Region (Attn: BCOO-1000)
PO Box 61470
Boulder City, NV 89006-1470

RE: Response to September 30, 2005 Federal Register Notice (70 FR 57322)

Dear Mr. Johnson:

In response to the Bureau of Reclamation's request for public comment on the scoping of the Environmental Impact Statement (EIS) for development of Lower Basin shortage guidelines and coordinated management strategies for the operation of Lake Powell and Lake Mead, Chandler submits the following information and comments. Chandler currently delivers water to over 200,000 residents and this number will increase to over 290,000. The Colorado River supplies a large portion of water needed to meet the demand of our residents. The City holds Central Arizona Project (CAP) sub-contracts for Municipal and Industrial Priority water, non-Indian agricultural priority water, and leases Indian priority water. CAP is the junior diverter in the lower basin. Management strategies and shortage guidelines developed through this process will impact Chandler's future water supply. I appreciate the opportunity to comment on the proposed development of these strategies.

Central Arizona Project water users will experience the greatest impact in the Lower Basin if the Secretary of the Interior declares a shortage. Therefore, it is imperative that the Bureau pays special attention to the comments from Chandler, the State of Arizona, the CAP, and Arizona water users. Chandler requests that the final management strategy and shortage guidelines under low reservoir conditions are consistent with the following:

1. Lake Powell and Lake Mead operations are consistent with the Law of the River.
2. Lakes Powell and Mead are operated for water supply purposes. Generation of hydroelectricity is subordinate to operation for water supply. Water users should not be subject to increased shortages for the benefit of hydroelectricity production.
3. The minimum objective release from Lake Powell to the lower basin must be at least 8.23 maf/yr. Lower basin shortage guidelines should expire no later than 2016, with the opportunity for review and revision preceding the expiration date.

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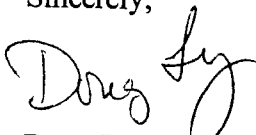
4. Mexico will share in shortages to the Lower Basin.
5. Any management strategy or shortage guidelines must consider operation of the Yuma Desalting Plant. If shortage guidelines and management strategies assume the Yuma Desalting Plant will not be operated, impacts to Arizona water users must be evaluated.
6. Through a public process established by the Arizona Department of Water Resources (ADWR), the affected Colorado River water users in Arizona have tentatively decided on lower basin shortage volumes. Chandler agrees with ADWR's recommendation that the EIS should analyze Lower Basin shortages that are implemented as follows:
 - 400,000 af shortage at or below 1075 ft at Lake Mead.
 - 500,000 af shortage at or below 1050 ft at Lake Mead.
 - 600,000 af shortage below 1025 ft at Lake Mead.

The final shortage guidelines must be flexible so that, after consultation with the affected Arizona water users and ADWR, any reductions beyond 600,000 af are accomplished in the least damaging way.

7. Within the context of existing contracts, affected Arizona water users and ADWR will determine how to most efficiently manage shortages within Arizona.
8. The Secretary of the Interior should implement the final management strategy through a record of decision after completion of the EIS by the Bureau.

I appreciate the opportunity to comment on behalf of the City of Chandler. I will continue to participate in this critical issue to ensure shortage criteria and reservoir management schemes are implemented to meet the intent of the Law of the River.

Sincerely,



Doug Toy P.E.
Water Resource Engineer

xc: Herb Guenther, Director, Arizona Department of Water Resources
Karen Barfoot P.E., Assistant Municipal Utilities Director, City of Chandler